

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

Re: ECF Nos. 2434, 8890, 9142

(Jointly Administered)

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO

Debtor.

PROMESA

Title III

No. 17 BK 3283-LTS

**This filing relates to the
Commonwealth.**

**INFORMATIVE MOTION
REGARDING MOTION REQUESTING
RELIEF OF STAY UNDER 362(D)(1) OF THE BANKRUPTCY CODE**

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17- BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

To the Honorable United States District Court Judge Laura Taylor Swain:

The Commonwealth of Puerto Rico (the “Commonwealth”), by and through the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as the Commonwealth’s representative pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act*, respectfully submits this Informative Motion (the “Motion”) regarding the *Motion Requesting Relief of Stay under 362(d)(1) of the Bankruptcy Code* [ECF No. 2434] (the “Lift Stay Motion”), the *Order Scheduling Further Proceedings Regarding Motion Requesting Relief from Automatic Stay* [ECF No. 8890],² and the *Order in Connection with Informative Motion Regarding Motion Requesting Relief of Stay Under 362(d)(1) of the Bankruptcy Code (Docket Entry No. 9130)* [ECF No. 9142]. In support of this Motion, the Commonwealth respectfully states as follows:

1. The parties have reached an agreement in principle to resolve the Lift Stay Motion and are working on definitive documentation of the agreement. Once finalized, the parties will submit such agreement for Court approval. Accordingly, the parties request that the Court adjourn the December 11, 2019 hearing on the Lift Stay Motion. The Commonwealth will file an informative motion to provide the Court a status update by December 16, 2019.

Dated: December 2, 2019
San Juan, Puerto Rico

Respectfully submitted,

/s/ Ehud Barak
Martin J. Bienenstock (*pro hac vice*)
Paul V. Possinger (*pro hac vice*)
Ehud Barak (*pro hac vice*)
Maja Zerjal (*pro hac vice*)

² Pursuant to the *Order in Connection with Informative Motion Regarding Motion Requesting Relief of Stay Under 362(d)(1) of the Bankruptcy Code (Docket Entry No. 9093)* [ECF No. 9098], the parties were deemed to consent to “an extension of the period referenced in 11 U.S.C. § 362(e)(1) pending the Court’s determination of the Lift Stay Motion.”

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